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November 1, 2023

**VIA ECF**

The Honorable Arun Subramanian  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Courtroom 15A  
New York, NY 10007-1312

**RE: *Flynn et al. v. Cable News Network, Inc.***, No. 1:21-cv-02587-AS-SLC – Letter-Motion in Support of Confidential and Highly Confidential Materials remaining under seal.

Dear Judge Subramanian:

We represent Plaintiffs in the above-referenced. Pursuant to Federal Rules of Civil Procedure 5.2(e) and 26(c), as well as Your Honor’s Individual Practice Rule 11(B), we are filing this letter-motion in support of keeping the redacted portions of Defendant Cable News Network’s (“CNN”) Motion for Summary Judgment, Memorandum in Support of Summary Judgment, Rule 56.1 Statement of Undisputed Material Facts, and certain confidential exhibits and deposition transcripts under seal because these documents cite to exhibits and deposition testimony that are designated as “Confidential” or “Highly Confidential” pursuant to the parties March 15, 2022 Confidentiality Stipulation and Protective Order (ECF Doc. No. 60) in this action.

The documents and deposition transcripts that are designated as confidential or high confidential in this matter must remain under seal because they include sensitive information relating to:

1. Plaintiffs’ locations and residences, which may present a security concern,
2. Privileged spousal communications,
3. Discovery materials subject to the protective order in this case, and
4. Confidential medical information.

To the extent that this Court is inclined to unseal any of these documents, Plaintiff would request leave of the Court to work with opposing counsel to unredact only the portions

*Letter Motion in support of designated material remaining under seal*

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of these documents that do not specifically relate to these issues that deserve the privacy of sealed and redacted documents.

Respectfully Submitted,



Jason C. Greaves